

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 07-
v.	:	DATE FILED: _____
CARRIE HARTER	:	VIOLATIONS:
DONALD VOGHT	:	21 U.S.C. § 846 (conspiracy to distribute
	:	methamphetamine - 1 count)
	:	21 U.S.C. § 841 (distribution of
	:	methamphetamine - 4 counts)
	:	18 U.S.C. § 1956(h) (conspiracy to commit
	:	money laundering - 1 count)
	:	18 U.S.C. § 1956(a)(1) (money laundering
	:	- 17 counts)
	:	18 U.S.C. § 1956(a)(3) (attempted money
	:	laundering – 3 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notices of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about January 2005 through on or about January 15, 2007, in West Goshen, in the Eastern District of Pennsylvania and elsewhere, defendants

CARRIE HARTER and
DONALD VOGHT

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 500 grams or more, that is, at least approximately 4.5 kilograms, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. From in or about January 2005 through in or about January 2007, at various times, defendant DONALD VOGHT purchased and obtained methamphetamine from his sister, defendant CARRIE HARTER, paying defendant HARTER approximately \$800 to \$1,000 per ounce of methamphetamine, and then distributed that methamphetamine to his own multiple drug customers located in Pennsylvania, including West Goshen, Pennsylvania, Virginia, the District of Columbia, Maryland, Delaware, and New York.

3. From at least in or about April 2005 through in or about January 2007, at various times, in Fullerton, California, defendant CARRIE HARTER purchased quantities of methamphetamine from multiple suppliers, and then sold and shipped a total of at least approximately 4.4 kilograms of that methamphetamine to defendant DONALD VOGHT, located in northern Virginia, including Leesburg and Ashburn, typically by shipping the drugs, and causing the drugs to be shipped, to defendant VOGHT through third-party businesses, including Federal Express, the United States Postal Service, and Mail Boxes Etc.

4. Defendant CARRIE HARTER distributed methamphetamine to drug customers introduced to defendant HARTER by defendant DONALD VOGHT, including a special agent of the Drug Enforcement Administration, working in an undercover capacity ("UC"), and located in Philadelphia, Pennsylvania.

5. Defendant DONALD VOGHT and defendant CARRIE HARTER utilized third-party businesses in order to transfer and attempt to conceal the proceeds of their drug distribution activities, including utilizing Western Union, Federal Express, accounts at Bank of

America, and a nominee account held in Philadelphia, Pennsylvania at Wachovia Bank, held in the name of "CPU Electronics, Inc.," a fictitious company.

6. From on or about January 3, 2005 through on or about June 12, 2006, at various times, defendant DONALD VOGHT, in Leesburg, Virginia, sent and caused to be sent to defendant CARRIE HARTER, in Fullerton, California, at least \$24,720 in currency through interstate wires through Western Union as payment for methamphetamine distributed by defendant HARTER to defendant VOGHT, until Western Union barred defendant VOGHT from using its services.

7. From at least in or about April 2006 through in or about January 2007, in northern Virginia, defendant DONALD VOGHT purported to operate "Spin Digital Solutions," a fictitious company which he created, and which in fact served as a cover for his drug business, and for which defendant VOGHT created and maintained phony business records in order to attempt to conceal the income and expenses attributable to his drug distribution activities as the income and expenses of legitimate business activity.

8. From in or about May 2005 through in or about January 2007, at various times, in northern Virginia, defendant DONALD VOGHT made deposits and interaccount transfers into Bank of America account number 004113808836, a bank account shared by defendant CARRIE HARTER and defendant VOGHT, so that defendant HARTER, in Fullerton, California, could make withdrawals and debits from bank account number 004113808836 at various times as payments for methamphetamine which defendant HARTER distributed to defendant VOGHT.

9. From at least in or about April 2005 through at least in or about December 2006, at various times, defendant CARRIE HARTER, in California, and defendant

DONALD VOGHT, in Virginia, exchanged e-mail communications regarding the purchase, shipment and receipt of methamphetamine, and the transfer of funds to pay for such shipments.

10. From at least in or about July 2006 through at least in or about December 2006, at various times, defendant DONALD VOGHT, in Virginia, sent e-mail communications regarding the delivery, purchase, and payment of methamphetamine to his methamphetamine customers, and to the UC located in Philadelphia.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 28, 2006, in Fullerton, California, defendant CARRIE HARTER opened Bank of America account number 1026445585 so that defendant HARTER could use this bank account to receive interaccount and wire transfers of drug proceeds from defendant DONALD VOGHT and the UC as payments for methamphetamine distributed by defendant HARTER.

2. On or about the following dates, defendant DONALD VOGHT drove a grey 2005 Toyota Camry, Virginia license plate KBK-5901, VIN no. 4T1BE30K75U615959 (hereinafter “ Toyota Camry”), from Leesburg, Virginia to West Goshen, Pennsylvania, and delivered to the UC the following approximate sums of cash earned from the sale of methamphetamine, so that the UC would deposit the cash drug proceeds into a nominee bank account held in the name of “ CPU Electronics Inc.,” and then transfer the monies through the nominee bank account to bank accounts controlled by defendant CARRIE HARTER and defendant VOGHT:

- A. \$10,000 on June 26, 2006;
- B. \$15,602 on July 10, 2006;
- C. \$26,000 on July 31, 2006; and
- D. \$29,180 on August 17, 2006.

3. On or about the following dates, defendant DONALD VOGHT drove the Toyota Camry from Ashburn, Virginia to Maryland and delivered to the UC the following approximate sums of cash earned from the sale of methamphetamine, so that the UC would deposit the cash drug proceeds into a nominee bank account held in the name of “ CPU Electronics Inc.” and transfer the monies through the nominee bank account to bank accounts controlled by defendant CARRIE HARTER and defendant VOGHT:

- A. \$14,000 on October 23, 2006; and
- B. \$15,000 on November 28, 2006.

4. On or about the following dates, and as a result of the drug proceeds delivered by defendant DONALD VOGHT to the UC, and in order for defendant VOGHT to pay defendant CARRIE HARTER for shipments of methamphetamine, defendant HARTER and defendant VOGHT received through different Bank of America accounts held in their names the following approximate total sums of proceeds, wired from the nominee bank account held in Philadelphia, Pennsylvania in the name of “ CPU Electronics Inc.”:

- A. \$10,000 on June 28, 2006;
- B. \$15,464 on July 13, 2006;
- C. \$25,931 on August 2, 2006;
- D. \$29,180 on August 22, 2006;
- E. \$14,000 on October 27, 2006; and

F. \$15,000 on December 4, 2006.

5. On or about June 26, 2006, defendant DONALD VOGHT drove the Toyota Camry from Virginia to West Goshen, Pennsylvania and distributed to the UC approximately 1.7 grams of methamphetamine, and provided the UC with a document which purported to be a business record of “Spin Digital Solutions,” but which in fact reflected the approximate income and expenses of defendant VOGHT’s methamphetamine distribution business for May 2006.

6. On or about July 31, 2006, defendant DONALD VOGHT drove the Toyota Camry from Virginia to West Goshen, Pennsylvania and distributed to the UC approximately 83.7 grams of methamphetamine.

7. On or about August 17, 2006, defendant DONALD VOGHT drove the Toyota Camry from Virginia to West Goshen, Pennsylvania and distributed to the UC approximately 14.2 grams of methamphetamine.

8. On or about August 23, 2006, in Virginia, defendant DONALD VOGHT sent an e-mail communication to the UC in Philadelphia, Pennsylvania, stating that defendant VOGHT had told defendant CARRIE HARTEr to have “3.5,” referring to three and a half ounces of methamphetamine, ready for the UC to purchase from defendant HARTEr when the UC traveled from Philadelphia to California and met with defendant HARTEr, and also stating that the price for the methamphetamine would be “7 grand,” referring to \$7,000.

9. On or about September 7, 2006, in Fullerton, California, and according to the plan described in the e-mail communication, which defendant DONALD VOGHT sent to the UC on or about August 23, 2006, defendant CARRIE HARTEr distributed to the UC approximately 97 grams of methamphetamine.

10. On or about September 18, 2006, defendant Donald VOGHT attempted to transport in the Toyota Camry approximately \$26,000 in drug proceeds from Virginia to Chester County, Pennsylvania, for the purpose of delivering the cash to the UC to deposit into the nominee bank account, and to receive from the UC approximately \$7,000 in currency for the approximately 97 grams of methamphetamine that defendant CARRIE HARTER distributed to the UC on or about September 7, 2006.

11. On or about September 25, 2006, and as payment for the 97 grams of methamphetamine distributed to the UC on or about September 7, 2006, defendant CARRIE HARTER and defendant DONALD VOGHT received through different Bank of America accounts held in their names the approximate total sum of \$7,000, wired from the bank account maintained in Philadelphia, Pennsylvania in the name of “ CPU Electronics Inc.”

12. On or about January 15, 2007, defendant DONALD VOGHT possessed at his residence, 43870 Chloe Terrace, Ashburn, Virginia, approximately 85 grams of methamphetamine for distribution, approximately \$20,959 in currency, a digital scale, shipping and packaging materials, records in the name of “ Spin Digital Solutions” regarding the purchase and sale of methamphetamine, and numerous documents from third-party businesses reflecting the purchase, sale and shipment of methamphetamine.

13. On or about January 15, 2007, defendant CARRIE HARTER possessed in California approximately 243.3 grams of methamphetamine for distribution, a digital scale, drug paraphernalia, and a record regarding drug income and drug debts.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 31, 2006, in West Goshen, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendants

**CARRIE HARTER and
DONALD VOGHT**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, 50 grams or more, that is, approximately 83.7 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 17, 2006, in West Goshen, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendants

**CARRIE HARTER and
DONALD VOGHT**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From on or about September 7, 2006 through on or about September 25, 2006, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendants

**CARRIE HARTER and
DONALD VOGHT**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, 50 grams or more, that is, approximately 97 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about October 13, 2006 through on or about October 26, 2006, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendant

CARRIE HARTER

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, 50 grams or more, that is, approximately 81 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about January 2005 through in or about January 2007, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**CARRIE HARTER and
DONALD VOGHT**

conspired and agreed, together and with other persons known and unknown to the grand jury:

(a) to knowingly conduct, attempt to conduct and cause to be conducted financial transactions affecting interstate commerce, that is, wire transfers of money from Philadelphia to bank accounts held in California and Virginia, and wire transfers of money from Virginia to California, and transfers of money between bank accounts held in California and Virginia, which transactions involved the proceeds of specified unlawful activity, that is, proceeds from a conspiracy to distribute methamphetamine, in violation of Title 21, United States Code, Section 846, knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, with intent to promote the carrying on of the specified unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

(b) to conduct, attempt to conduct and cause to be conducted financial transactions affecting interstate commerce, that is, wire transfers of money from Philadelphia to bank accounts held in California and Virginia, which transactions involved the proceeds of specified unlawful activity, that is, proceeds from a conspiracy to distribute methamphetamine, in violation of Title 21, United States Code, Section 846, knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, and knowing that the

transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MANNER AND MEANS

It was a part of the conspiracy that:

2. From on or about January 3, 2005 through on or about June 12, 2006, at various times, defendant DONALD VOGHT, in Virginia, sent and caused to be sent to defendant CARRIE HARTEER, in California, at least approximately \$24,720 in drug currency through interstate wires through Western Union as payment for methamphetamine distributed by defendant HARTEER to defendant VOGHT, until Western Union barred defendant VOGHT from using its services.

3. From in or about May 2005 through in or about January 2007, at various times, in Virginia, defendant DONALD VOGHT made deposits and transfers of drug proceeds into Bank of America account number 004113808836, a bank account shared by defendant CARRIE HARTEER and defendant VOGHT, so that defendant HARTEER, in California, could make withdrawals and debits from bank account number 004113808836 at various times as payments for methamphetamine which defendant HARTEER distributed to defendant VOGHT.

4. Defendant DONALD VOGHT provided an approximate total of \$109,782 in cash drug proceeds through personal transfers to an undercover special agent of the Drug Enforcement Administration ("UC"), so that the UC would deposit the drug cash proceeds into a nominee bank account held at Wachovia Bank in the name of "CPU Electronics, Inc.," a fictitious company, and so that the UC then would wire transfer those drug proceeds into bank accounts held by defendant CARRIE HARTEER and defendant VOGHT, for the dual purposes of

paying for methamphetamine distributed by defendant HARTER to defendant VOGHT, and disguising the nature, location, source, ownership and control of the drug proceeds.

5. Defendant CARRIE HARTER opened and maintained Bank of America account number 1026445585 so that defendant HARTER could use this bank account to receive interaccount and wire transfers of drug proceeds from defendant DONALD VOGHT and from the UC as payments for methamphetamine distributed by defendant HARTER.

6. From at least in or about April 2006 through in or about January 2007, in northern Virginia, defendant DONALD VOGHT purported to operate "Spin Digital Solutions," a fictitious company which he created, and which in fact served as a cover for his drug business, and for which defendant VOGHT created and maintained phony business records in order to attempt to conceal the income and expenses attributable to his drug distribution activities as the income and expenses of legitimate business activity.

7. From at least in or about April 2005 through at least in or about December 2006, at various times, defendant CARRIE HARTER, in California, and defendant DONALD VOGHT, in Virginia, exchanged e-mail communications regarding the transfer of funds through wires and bank account transfers to pay for distributions of methamphetamine from defendant HARTER to defendant VOGHT.

8. From at least in or about July 2006 through in or about January 2007, at various times, defendant DONALD VOGHT, in Virginia, sent to the UC located in Philadelphia e-mail communications regarding the transfer of funds through wires and bank account transfers to pay for distributions of methamphetamine from defendant HARTER to defendant VOGHT.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the following overt acts, among others, took place in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 28, 2006, in California, defendant CARRIE HARTER opened Bank of America account number 1026445585 so that defendant HARTER could use this bank account to receive interaccount and wire transfers of drug proceeds from defendant DONALD VOGHT and the UC as payments for methamphetamine distributed by defendant HARTER.

2. On or about the following dates, in West Goshen, Pennsylvania, defendant DONALD VOGHT delivered to the UC the following approximate sums of cash earned from the sale of methamphetamine, so that the UC would deposit the cash drug proceeds into a nominee bank account held in the name of “ CPU Electronics Inc.” and transfer the proceeds through the nominee bank account to bank accounts controlled by defendant CARRIE HARTER and defendant VOGHT:

- A. \$10,000 on June 26, 2006;
- B. \$15,602 on July 10, 2006;
- C. \$26,000 on July 31, 2006; and
- D. \$29,180 on August 17, 2006.

3. On or about the following dates, in Maryland, defendant DONALD VOGHT delivered to the UC the following approximate sums of cash earned from the sale of methamphetamine, so that the UC would deposit the cash drug proceeds into a nominee bank account held in the name of “ CPU Electronics Inc.” and transfer the proceeds through the

nominee bank account to bank accounts controlled by defendant CARRIE HARTER and defendant VOGHT:

- A. \$14,000 on October 23, 2006; and
- B. \$15,000 on November 28, 2006.

4. On or about the following dates, and as a result of the drug proceeds delivered by defendant DONALD VOGHT to the UC, and in order for defendant VOGHT to pay defendant CARRIE HARTER for shipments of methamphetamine, and in order to disguise the nature, location, source, ownership and control of the payments, defendant HARTER and defendant VOGHT received through different Bank of America accounts held in their names the following approximate total sums of drug proceeds, wired from the nominee bank account held in Philadelphia, Pennsylvania in the name of “ CPU Electronics Inc.”:

- A. \$10,000 on June 28, 2006;
- B. \$15,464 on July 13, 2006;
- C. \$25,931 on August 2, 2006;
- D. \$29,180 on August 22, 2006;
- E. \$14,000 on October 27, 2006; and
- F. \$15,000 on December 4, 2006.

5. On or about September 18, 2006, defendant Donald VOGHT attempted to transport from Virginia area to Chester County, Pennsylvania approximately \$26,000 in proceeds earned from the sale of methamphetamine for the purpose of delivering the cash to the UC to deposit into the nominee bank account.

6. On or about January 15, 2007, defendant DONALD VOGHT possessed at his residence, 43870 Chloe Terrace, Ashburn, Virginia, approximately \$20,959 in drug currency, records in the name of “ Spin Digital Solutions” regarding the purchase and sale of methamphetamine, and numerous documents from third-party businesses reflecting the purchase, sale and shipment of methamphetamine.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS SEVEN THROUGH TWENTY-THREE

1. On or about the approximate dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**CARRIE HARTER and
DONALD VOGHT**

knowingly conducted, and aided and abetted and willfully caused the conducting of, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
Seven	6/28/06	Wire transfer of approximately \$6,980, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 004126693643, held in the name of Donald VOGHT, in Leesburg, Virginia
Eight	6/28/06	Wire transfer of approximately \$3,020, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 004113808836, held in the name of Donald VOGHT, in Leesburg, Virginia, and Carrie HARTER, in Fullerton, California
Nine	7/13/06	Wire transfer of approximately \$12,500, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 004126693643, held in the name of Donald VOGHT, in Leesburg, Virginia
Ten	7/13/06	Wire transfer of approximately \$2,000, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 004113808836, held in the name of Donald VOGHT, in Leesburg, Virginia, and Carrie HARTER, in Fullerton, California
Eleven	7/13/06	Wire transfer of approximately \$964, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 1026445585, held in the name of Carrie HARTER, in Fullerton, California

Twelve	8/02/06	Wire transfer of approximately \$9,977, from "CPU Electronics Inc." in Philadelphia to Bank of America account number 004126693643, held in the name of Donald VOGHT, in Leesburg, Virginia
Thirteen	8/02/06	Wire transfer of approximately \$9,977, from "CPU Electronics Inc." in Philadelphia to Bank of America account number 004113808836, held in the name of Donald VOGHT, in Leesburg, Virginia, and Carrie HARTEER, in Fullerton, California
Fourteen	8/02/06	Wire transfer of approximately \$2,977, from "CPU Electronics Inc." in Philadelphia to Bank of America account number 004351026881, held in the name of Donald VOGHT, in Leesburg, Virginia
Fifteen	8/02/06	Wire transfer of approximately \$3,000, from "CPU Electronics Inc." in Philadelphia to Bank of America account number 1026445585, held in the name of Carrie HARTEER, in Fullerton, California
Sixteen	8/22/06	Wire transfer of approximately \$9,180, from "CPU Electronics Inc." in Philadelphia to Bank of America account number 004126693643, held in the name of Donald VOGHT, in Ashburn, Virginia
Seventeen	8/22/06	Wire transfer of approximately \$15,000, from "CPU Electronics Inc." in Philadelphia to Bank of America account number 004113808836, held in the name of Donald VOGHT, in Ashburn, Virginia, and Carrie HARTEER, in Fullerton, California
Eighteen	8/22/06	Wire transfer of approximately \$5,000, from "CPU Electronics Inc." in Philadelphia to Bank of America account number 1026445585, held in the name of Carrie HARTEER, in Fullerton, California
Nineteen	10/27/06	Wire transfer of approximately \$7,000 from "CPU Electronics Inc." in Philadelphia to Bank of America account number 004126693643, held in the name of Donald VOGHT, in Ashburn, Virginia
Twenty	10/27/06	Wire transfer of approximately \$7,000, from "CPU Electronics Inc." in Philadelphia to Bank of America account number 004113808836, held in the name of Donald VOGHT, in Ashburn, Virginia, and Carrie HARTEER, in Fullerton, California

Twenty-One	12/04/06	Wire transfer of approximately \$7,500 from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 004126693643, held in the name of Donald VOGHT, in Ashburn, Virginia
Twenty-Two	12/04/06	Wire transfer of approximately \$5,000, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 004113808836, held in the name of Donald VOGHT, in Ashburn, Virginia, and Carrie HARTEr, in Fullerton, California
Twenty-Three	12/04/06	Wire transfer of approximately \$2,500, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 1026445585, held in the name of Carrie HARTEr, in Fullerton, California

2. When conducting, and aiding and abetting and causing the conducting of, each of the financial transactions described in paragraph 1 above, defendants CARRIE HARTEr and DONALD VOGHT knew that the money involved in each financial transaction represented the proceeds of some form of unlawful activity.

3. Each financial transaction described in paragraph 1 involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute methamphetamine, in violation of Title 21, United States Code, Section 846, and defendants CARRIE HARTEr and DONALD VOGHT acted with intent to promote the carrying on of the specified unlawful activity, and knowing that each transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i), and Title 18, United States Code, Section 2.

COUNTS TWENTY-FOUR AND TWENTY-FIVE

1. On or about the approximate dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**CARRIE HARTER and
DONALD VOGHT**

knowingly conducted, and aided and abetted and willfully caused the conducting of, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
Twenty-Four	9/25/06	Wire transfer of approximately \$5,000, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 004113808836, held in the name of Donald VOGHT, in Ashburn, Virginia, and Carrie HARTER, in Fullerton, California
Twenty-Five	9/25/06	Wire transfer of approximately \$2,000, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 1026445585, held in the name of Carrie HARTER, in Fullerton, California

2. When defendants CARRIE HARTER and DONALD VOGHT conducted, and aided and abetted and caused the conducting of, the financial transactions described in paragraph 1 above, an undercover special agent of the Drug Enforcement Administration (“UC”) represented to defendants HARTER and VOGHT that the proceeds involved in the transactions were the proceeds of illegal drug trafficking, specifically, distribution of methamphetamine and conspiracy to distribute methamphetamine, in violation of Title 21, United States Code, Sections 841 and 846.

3. When conducting the financial transaction described in paragraph 1 above, defendants CARRIE HARTER and DONALD VOGHT acted with intent to conceal and disguise the nature, location, source, ownership and control of what they believed were the proceeds of

the specified unlawful activity, and with intent to promote the carrying on of such specified unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(3), and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

1. On or about October 13, 2006, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

CARRIE HARTER

knowingly conducted, and aided and abetted and willfully caused the conducting of, a financial transaction affecting interstate commerce, that is, the wire transfer of approximately \$5,000, from “CPU Electronics Inc.” in Philadelphia to Bank of America account number 1026445585, held in the name of Carrie HARTER, in Fullerton, California.

2. When defendant CARRIE HARTER conducted, and aided and abetted and caused the conducting of, the financial transaction described in paragraph 1 above, an undercover special agent of the Drug Enforcement Administration (“UC”) represented to defendant HARTER that the proceeds involved in the transaction were the proceeds of illegal drug trafficking, specifically, distribution of methamphetamine and conspiracy to distribute methamphetamine, in violation of Title 21, United States Code, Sections 841 and 846.

3. When conducting the financial transaction described in paragraph 1 above, defendant CARRIE HARTER acted with intent to conceal and disguise the nature, location, source, ownership and control of what she believed were the proceeds of the specified unlawful activity, and with intent to promote the carrying on of such specified unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(3), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this indictment, defendants

**CARRIE HARTER, and
DONALD VOGHT**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to the sum of \$193,461; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$193,461.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1956, set forth in this indictment, defendants

**CARRIE HARTER, and
DONALD VOGHT**

shall forfeit to the United States of America any and all property involved in such offenses, and any property traceable to such property, including but not limited to the sum of \$193,461.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this indictment, defendant

DONALD VOGHT

shall forfeit to the United States of America: a 2005 Toyota Camry, VIN no. 4T1BE30K75U615959.

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to a 2005 Toyota Camry, VIN no. 4T1BE30K75U615959; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, a 2005 Toyota Camry, VIN no. 4T1BE30K75U615959.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**